

REMARKS

The Office Action dated July 25, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-15 are pending in the application. Claims 1, 6, and 11 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter is added. Applicant submits the pending claims for consideration in view of the following.

Claim Objections

The Office Action objected to claims 1, 6, and 11 because of minor informalities. As indicated above, claims 1, 6, and 11 have been amended to address and resolve these informalities. Withdrawal of this rejection is therefore respectfully requested.

Claim Rejections under 35 U.S.C. §102(b)

The Office Action rejected claims 1, 3-6, 8-11, and 13-15 under 35 U.S.C. §102(b) as allegedly anticipated by Kalkunte, *et al.* (U.S. Publication No. 2002/0027908) ("Kalkunte,"). The Office Action alleged that Kalkunte discloses or suggests every claim feature recited in claims 1, 3-6, 8-11, and 13-15. Applicant respectfully traverses these rejections for at least the following reasons.

Claim 1, upon which claims 2-5 depend, is generally directed to a method of handling frames in a network device. The method includes receiving a frame at a network device of an assembly of network devices, with the assembly of devices divided into a first side and a second side and the network device being on the first side. The method also includes examining the received frame to determine whether the frame is destined for a member of a specific trunk group. The method also includes determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side, and forwarding the frame to a trunk group destination port that is local to the network device if the frame is destined for a member of the specific trunk group and the destination device identifier corresponds to a network device of the second side. Additionally, the method includes, if the frame does not correspond to the network device of the second side, determining an alternative destination port for the frame and forwarding the frame to the alternative destination port.

Claim 6, upon which claims 7-10 depend, is generally directed to a network device for handling frames. The network device includes a receiving means for receiving a frame by a network device of an assembly of network devices, with the assembly of devices divided into a first side and a second side and the network device being on the first side. The network device also includes an examining means for examining the received frame to determine whether the frame is destined for a member of a specific trunk group. The network device further includes determining means for determining whether a destination device identifier for the frame corresponds to one of the network

devices on the second side, and forwarding means for forwarding the frame to a trunk group destination port that is local to the network device if the frame is a member of the specific trunk group and the destination device identifier corresponds to a network device of the second side, and, if the frame does not correspond to the network device of the second side, determining an alternative destination port for the frame and forwarding the frame to the alternative destination port.

Claim 11, upon which claims 12-15 depend, is generally directed to a network device for handling frames. The device includes a plurality of ports, configured to send and receive data frames, with at least one of said ports connected to other network devices of an assembly of network devices, with the assembly of devices divided into a first side and a second side and the network device being on the first side. The device also includes at least one port interface, for coordinating actions of said plurality of ports, where the at least one port interface is configured to examine the received data frames to determine whether the data frames are destined for a member of a specific trunk group. The at least one port is further configured to determine whether a destination device identifier for the frame corresponds to one of the network devices on the second side and forward the frame to a trunk group destination port that is local to the network device, if the destination port is a member of the specific trunk group and the destination device identifier corresponds to a network device of the second side. The device is also configured to, if the frame does not correspond to the network device of the second side,

determining an alternative destination port for the frame and forwarding the frame to the alternative destination port.

Each of the foregoing claims recites limitations that are not disclosed by Kalkunte.

Kalkunte generally discloses a switch fabric that includes path redundancy. In Kalkunte, the switch fabric is presented as a self-routing fabric that uses Ethernet, fast Ethernet, 1 gigabit and 10,000Mbps/s Ethernet systems, where all of the hardware is disposed on a single microchip. Kalkunte also discloses packet processing and forwarding of data to maximize packet-forwarding at line speed.

However, Kalkunte fails to disclose or suggest, at least, “examining the received frame to determine whether the frame is destined for a member of a specific trunk group; determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side; forwarding the frame to a trunk group destination port that is local to the network device if the frame is destined for a member of the specific trunk group and the destination device identifier corresponds to a network device of the second side,” as recited in claim 1, and as similarly recited in claims 6 and 11.

Instead, in paragraph [0011], Kalkunte discloses that an incoming packet is received by a first port and a first packet portion is read to determine particular packet information, which includes a source address and a destination address. Then, an egress port bitmap is determined based on a lookup in a forwarding table and it is determined if the destination address belongs to a trunk group of trunked ports. If the packet does not belong to a trunk group, then the packet is forwarded based on the egress port bitmap.

However, if the packet does belong to a trunk group, then a particular trunked port of the trunk group may be determined by calculating a hash value based on the source address and the destination value and selecting the particular trunked port based on the hash value.

Consequently, Kalkunte does not disclose “examining the received frame to determine whether the frame is destined for a member of a specific trunk group” and “determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side.” Instead, Kalkunte discloses determining whether the packet “belongs to a trunk group of trunked ports” and determining a “particular trunked port of the trunk group.” Naturally therefore, Kalkunte also fails to disclose “forwarding the frame to a trunk group destination port that is local to the network device if the frame is destined for a member of the specific trunk group and the destination device identifier corresponds to a network device of the second side” (emphasis added). Indeed, Kalkunte fails to disclose any operation for forwarding a frame to a trunk group destination port that is local to the network device, let alone based on a determination that the frame corresponds to a trunk group and a determination that an identifier of the frame corresponds to a network device.

Accordingly, Kalkunte fails to disclose or suggest all the limitations of claim 1. Additionally, Kalkunte fails to disclose or suggest all the limitations of independent claims 6 and 11, as these claims recite similar limitations, though each claim has its own scope. Furthermore, Kalkunte fails to disclose all the limitations of claims 3-5, 8-10, and

13-15 for their dependency from claims 1, 6, and 11, as well as for the patentable subject matter recited therein. Therefore, Applicant respectfully requests that the rejection to claims 1, 3-6, 8-11, and 13-15 be withdrawn.

Claim Rejections under 35 U.S.C. §103(a)

The Office Action rejected claims 2, 7, and 12 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Kalkunte as applied to claims 1, 6, and 11, and further in view of Varanasi, *et al.* (U.S. Publication No. 2005/0105904) (“Varanasi”). The Office Action took the position that Kalkunte fails to disclose or suggest that the examining of the received frame comprises examining the received frame to determine whether the frame is destined for the member of the specific trunking group of ports providing connections over a high speed data port interface. This rejection is traversed on the grounds that a combination of Kalkunte and Varanasi fails to disclose or suggest all the limitations of claims 2, 7, and 12.

Kalkunte is discussed above. Varanasi generally describes a system and a method to route a flow of frames through a switch. In Varanasi, at least one frame is received from the flow of frames and a process is applied to select an exit port of the switch from a set of possible exit ports through which at least one frame from the flow of frames will exit so as to potentially reduce frame traffic congestion along potential routes that include the set of possible exit ports. The set of possible exit ports includes at least some of the exit ports of at least two trunk groups.

However, Varanasi does not cure the deficiencies of Kalkunte. Similarly to Kalkunte, Varanasi fails to disclose or suggest disclose “examining the received frame to determine whether the frame is destined for a member of a specific trunk group; determining whether a destination device identifier for the frame corresponds to one of the network devices on the second side; forwarding the frame to a trunk group destination port that is local to the network device if the frame is destined for a member of the specific trunk group and the destination device identifier corresponds to a network device of the second side,” as recited in claim 1, and as similarly recited in claims 6 and 11.

Rather, Varanasi focuses on selecting an exit port of the switch from a set of possible exit ports through which at least one frame from the flow of frames will exit so as to potentially reduce frame traffic congestion. Accordingly, a combination of Kalkunte and Varanasi fails to teach or suggest all the features of independent claims 1, 6, and 11, and related dependent claims. Therefore, Applicant respectfully requests that the rejection of claims 2, 7, and 12 be withdrawn.

Conclusion

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant’s undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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